

#### REMARKS/ARGUMENTS

Claims 1-19 are pending in this application. Claims 1-8, 12-14, and 17-19 have been rejected. Claims 9-11, 15 and 16 have been objected to, but contain allowable subject matter. Claim 17 has been amended. Claims 1-16 and 18-19, as set forth in the Listing of Claims, have not been amended. New Claims 20-23 have been added.

The Examiner is thanks for his full consideration of the Applicant's prior response.

Claims 1, 4 and 6-8 have been rejected under 35 U.S.C. §102(b) as being anticipated by Boyer (U.S. Patent No. 3,755,630). For the following reasons, the Examiner's rejection is respectfully traversed.

Boyer does not meet every claim limitation of Applicant's Claims 1, 4 and 6-8, and thus does not anticipate the same under the law pertaining to 35 U.S.C. §102.

Claims 1, 4 and 6 encompass a rack or shelf assembly 40 having at least two customer interface module connectors 60, 61 ("CIM connectors"), selectively connecting or receiving a customer interface module 70 ("CIM") in either of the CIM connectors 60 or 61. Boyer, on the other hand, does not disclose any corresponding elements that would equate to "at least two customer interface module connectors" on the shelf assembly, to which the CIM selectively connects.

Unlike Applicant which only has one CIM, Boyer discloses two terminal blocks 31 which are fixedly mounted directly to the shelf unit, not to any connector (as best seen in Figure 4 of Boyer). As such, Boyer fails to anticipate any CIM connectors, and more specifically fails to anticipate that a CIM is selectively connectable to either one of at least two CIM connectors.

The Examiner's rejection states that Boyer's equipment shelf has "inherent customer interface module [connectors]..." and that these inherent connectors "would have been provided for the purpose of connecting the terminal blocks to the equipment shelf". However there are no such inherent CIM connectors in Boyer, nor does Boyer teach or suggest any.

For ease of understanding, Applicant's customer lines (shown in Figs. 5A-5D) are connected to customer line connectors 72, 74 or 76 on CIM 70. CIM 70 has a separate connector 78 (Fig. 2C) which is connected to either one of two (or more) CIM connectors 60 or 61 on the shelf assembly 40. It can thus be seen that Boyer does not disclose any such corresponding CIM connectors. Again, Boyer's terminal blocks 31 are mounted directly to the shelf assembly, not connected to any "inherent" connectors. Further, there is no teaching, suggestion or motivation in Boyer to connect the terminal blocks 31 to a CIM connector as opposed to connecting directly to the equipment shelf.

Accordingly, Boyer does not anticipate the limitations of Applicant's Claims 1, 4 and 6, including, *inter alia*, the limitations that there are at least two customer interface module connectors on the shelf assembly, as well as a customer interface module being selectively connectable to or receivable in either one of the CIM connectors.

Additionally, with respect to Claims 4 and 6-8, Boyer fails to anticipate a printed circuit board, as well as the CIM connectors (missing in Boyer) being on the printed circuit board. The rear wall 1 of Boyer is not a printed circuit board.

For the above reasons, Applicant respectfully requests reconsideration and removal of the Examiner's rejection.

Claims 2, 3, 5, 12-14, 17 and 19 have been rejected under 35 U.S.C. §103 as being unpatentable over the combination of Boyer in view of De Bortoli et al. (U.S. Patent 3,784,728). For the following reasons, the Examiner's rejection is respectfully traversed.

Applicant respectfully states that the above identified deficiencies of Boyer remain in the Examiner's proposed combination, and for the reasons stated above, the Examiner's proposed combination does not make obvious Applicant's claimed invention. Further, De Bortoli et al. is being cited to show a cover for the proposed combination. However, in addition to the above deficiencies, De

Bortoli et al. further fails to meet numerous limitations of Claims 2, 3, 5, 12-14, 17 and 19.

Regarding Claim 2, while De Bortoli et al. does disclose a cover 14, the cover 14 only essentially serves as a front cover or face plate (as best seen in Figure 5 of De Bortoli et al.) and is not a cover for the shelf assembly as a whole.

Regarding Claims 3 and 5, De Bortoli et al. does not disclose a cover with side openings or CIM receiving openings for placement around a CIM. The cover 14 of De Bortoli et al. essentially does not even have sides or any equivalent openings.

Regarding Claim 12, the cover in the proposed combination does not enclose the back wall and each side wall (top, bottom, left and right), unlike Applicant's claim 12. Applicant's cover encloses or surrounds the printed circuit board, as well as each of the top flange, the bottom flange, the first side flange and the second side flange (see Figures 1A, 1B and 2A). By enclosing or surround these elements, they are all under the cover and cannot be seen or accessed (except at the openings) unless the cover is removed. The cover of the proposed combination merely covers the front of the shelf.

Regarding Claim 13, the cover 14 of De Bortoli et al. does not have at least two cut out portions to allow clearance of the CIM.

Regarding Claim 14, the proposed combination is not removably mounted to a back mounting plate.

Regarding Claims 17 and 19, for the reasons discussed above, the proposed combination fails to meet, inter alia, the limitation(s) that the shelf assembly has both a first and a second customer interface module connector, or a customer interface module selectively and removably connected to either one of these two connectors.

Regarding Claim 18, it is unclear whether this claim has been rejected. On page 4 of the Office Action, the first paragraph of section 3, Claim 18 is not included in the rejection. On page 5, the last paragraph of section 3, Claim 18 is included. However, no other reference to Claim 18 is made in the rejection. Nonetheless, the cover of the proposed combination is hinged, and is thus not removable outwardly away from the shelf assembly.

For the above reasons, Applicant respectfully requests reconsideration and removal of the Examiner's rejection.

New Claims 20-23 have been added. Claim 20 claims that each of the plurality of network interface unit connectors is operatively connected to each of the at least two customer interface module connectors. This is not disclosed or suggested in the prior art. Claim 21 claims that the at least two customer interface module connectors are inversely operatively connected to the plurality of network interface unit connectors. This is not disclosed or suggested in the prior art. Claim 22 claims that the customer

interface module comprises at least one customer line connector and an edge connector for connecting with one of the at least two customer interface module connectors, with the at least one customer line connector being operatively connected to the edge connector. This is not disclosed or suggested in the prior art. Claim 23 claims a customer interface module comprising a housing, a plurality of customer line connectors in the housing, and an edge connector on the housing, with the edge connector being operatively connected to the plurality of customer line connectors, and wherein the edge connector is selectively, removably receivable in at least one corresponding connector on a telecommunications device. This is not disclosed or suggested in the prior art. Accordingly, it is respectfully submitted that new Claims 20-23 are in condition for allowance.

As described above, neither Boyer, De Bortoli et al., nor the prior art of record, either alone or in combination, fairly teach, suggest or disclose the novel and unobvious features of Applicant's claims. Accordingly, Applicant respectfully asserts that the claims as presented herein are in condition for immediate allowance. An early Notice of Allowance is respectfully requested.

Any arguments of the Examiner not specifically addressed should not be deemed admitted, conceded, waived, or acquiesced by Applicant.

Any additional or outstanding matters the Examiner may have are respectfully requested to be disposed of by telephoning the undersigned.

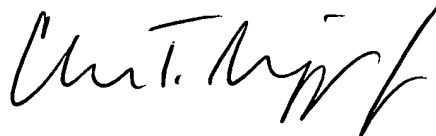
A Petition for an extension of time to make this Response timely is enclosed herewith and respectfully requested.

A form PTO-2038 is enclosed herewith in payment of the Extension fee, as well as the additional claim fee. The Commissioner is hereby authorized to charge any additional or deficient fees which may be required to Deposit Account 16-0657.

A postcard is enclosed evidencing receipt of the same.

Respectfully submitted,

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